

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE COLUMBIA UNIVERSITY TUITION
REFUND ACTION

Lead Case No. 1:20-cv-03208 (JMF)

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**DECLARATION OF ROY T. WILLEY, IV IN SUPPORT OF PLAINTIFFS'
MOTION FOR ATTORNEY'S FEES**

I, Roy T. Willey, IV declare as follows:

1. I am a member of Anastopoulo Law Firm ("ALF") and Co-Lead Counsel for Plaintiffs in the above-captioned matter. I have been admitted to practice *pro hac vice* in this action. (ECF 15). The testimony provided herein is based on my own personal knowledge, information and belief and, if called upon, I could and would competently testify thereto.

2. I submit this declaration in support of Plaintiffs' Motion for Attorney's Fees, in the above-referenced action, which is being filed contemporaneously herewith.

3. My firm and our local counsel seek attorney's fees and reimbursement of expenses for the work performed as Co-Lead Counsel and local counsel for Plaintiffs in the above-captioned matter. My firm and local counsel undertook this representation on a wholly contingent basis, with the understanding that we would receive no compensation, and our expenses would not be reimbursed, unless our efforts resulted in the recovery of a substantial benefit for Plaintiffs. None of the attorneys' fees and expenses submitted to this Court have been paid from any source or have been the subject of any prior request or prior award in any litigation or other proceeding.

4. My firm acted as Co-Lead Counsel for Plaintiffs and, together with local counsel, prosecuted Plaintiffs claims on their behalf. The specific work my firm and local counsel

actively engaged in during the prosecution of the above-captioned action included, but was not limited to: (i) reviewing of pleadings; (ii) researching the applicable law with respect to the claims alleged and the potential defenses thereto; (iii) preparing and filing a complaint; (iv) negotiating and collaborating on consolidation of the later-filed case; (v) drafting and filing a consolidated class action complaint; (vi) briefing and arguing the Motion to Dismiss; (vii) drafting discovery; (viii) consulting with experts; (ix) making a settlement demand; (x) leading the settlement discussions and negotiating a settlement; (xi) participating in the preparation of the stipulation of settlement and the motion papers in support of the proposed settlement; and (xii) communications with our client and co-counsel throughout the prosecution of the action.

5. From the inception of the Actions through the present, ALF and local counsel devoted **887** hours to the litigation, representing total lodestar of **\$529,448.30**. ALF and local counsel's lodestars were prepared from contemporaneous, daily time records prepared and maintained by each firm. ALF and local counsel's hourly rates, as reflected in the chart in paragraph six below, are lower than ALF and local counsel's usual and customary rates but are the rates agreed to in this action pursuant to the LaffeyMatrix. These rates are set based on market rates for attorneys of comparable skill and experience, and they have been approved by federal and state courts throughout the nation. *See* Exhibit A attached hereto (firm résumé).

6. The chart below summarizes the hours, hourly rates, and lodestar of each ALF professional and local counsel member who worked on this matter:

NAME	POSITION	HOURS	RATE	TOTAL
Amen Myers	C	11.2	\$208.00	\$2,329.60
Blake Abbott	A	195.1	\$381.00	\$74,333.10
Cierra Grier	PL	20	\$208.00	\$4,160.00
Dana Adkins	A	0.5	\$676.00	\$338.00

Edward Toptani	LC	69.4	\$919.00	\$63,778.60
Eric Poulin	P	116.3	\$676.00	\$78,618.80
Jacqueline Dufour	A	9.3	\$381.00	\$3,543.30
Jarrett Withrow	A	3.5	\$381.00	\$1,333.50
Johnathan Rice	C	1.8	\$208.00	\$374.40
John Bradham	LC	48.9	\$919.00	\$44,939.10
Josh Henke	A	17.3	\$381.00	\$6,591.30
Julia Pirillo	A	8.9	\$381.00	\$3,390.90
Justin Hemlepp	A	7.1	\$764.00	\$5,424.40
Kellie Hunt	PL	3.2	\$208.00	\$665.60
Knial Piper	PL	4.6	\$208.00	\$956.80
Melissa Freeman	C	8.3	\$208.00	\$1,726.40
Monica Toomer	PL	17	\$208.00	\$3,536.00
Peter Katzman	LC	39.9	\$764.00	\$30,483.60
Paul Doolittle	A	58.1	\$919.00	\$53,393.90
Ralph D'Agostino, III	A	18.7	\$381.00	\$7,124.7
Roy Willey, IV	P	202	\$676.00	\$136,552.00
Sal Davi	A	2.7	\$381.00	\$1,028.70
Trinity Rawlerson	S	23.2	\$208.00	\$4,825.60
TOTAL HOURS		887	TOTAL LODESTAR	\$529,448.30

(P) Partner; (A) Attorney; (C) Clerk; (PL) Paralegal; (S) Secretary; (LC) Local Counsel

7. I supervised and worked directly with the professionals who spent time on this matter. I can aver that the hours reported and the work they reflect were reasonably necessary to the successful commencement, prosecution, and settlement of the claims.

8. ALF and local counsel incurred a total of **\$952** in unreimbursed expenses in connection with the prosecution of the above referenced action, as summarized in the chart below:

CATEGORY	TOTAL
Court Filing Fees	\$400
<i>Pro Hac Vice</i> Fees	\$200
Certificates of Good Standing	\$152
TOTAL EXPENSES	\$752

9. These expenses are reflected in records maintained by my firm, or local counsel's firms, in the ordinary course of business. These records are prepared from expense vouchers, invoices, and other records submitted contemporaneously as they are incurred. I have reviewed the expense records in detail and can aver that they were reasonably necessary for the effective and efficient prosecution and resolution of the claims brought on behalf of Plaintiffs, and they are reasonable in amount.

10. As set forth in ALF's firm résumé, a true and correct copy of which is attached hereto as Exhibit A, the attorneys primarily responsible for participating in the prosecution of the above captioned action are experienced and skilled advocates.

11. Further, ALF's local counsel in this matter were also experienced and skilled advocates. Specifically:

John M. Bradham - Morea Schwartz Bradham Friedman & Brown LLP

Mr. Bradham has over 30 years of complex commercial litigation experience. Mr. Bradham is a member of good standing with the Bars of the State of New York and District of Columbia and is admitted to practice in this Court and the United States District Court for the Northern District of New York. Mr. Bradham has handled a broad range of commercial disputes involving contract, fraud, bankruptcy, securities, partnership, real estate, construction, technology, employment and other issues. Mr. Bradham has litigated cases in numerous federal and state courts throughout the country, including this Court. Mr. Bradham has also handled many arbitrations and mediations, and has represented clients before both federal and state agencies.

Peter B. Katzman - Morea Schwartz Bradham Friedman & Brown LLP

Peter Katzman has over 17 years of complex commercial litigation experience. Mr. Katzman is a member of good standing with the Bar of the State of New York and is admitted to practice in

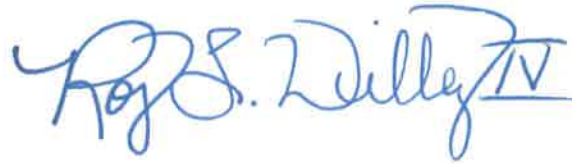
this Court and the United States District Courts for the Eastern and Northern Districts of New York and the District of Connecticut. Mr. Katzman has handled a broad range of commercial disputes involving contract, fraud, bankruptcy, securities, partnership, real estate, construction, technology, employment and other issues. Mr. Katzman has litigated cases in federal and state courts, including this Court. Mr. Katzman also serves as a registered FINRA Dispute Resolution Arbitrator.

Edward G. Toptani – Toptani Law PLLC

Mr. Toptani has over 30 years of complex litigation and transactional experience in New York City. He has handled a variety of matters, including disputes involving contracts, securities, real estate, partnerships, intellectual property, banking and hedge funds. He has litigated federal and state cases in various states, including New York, California, Illinois, Florida, Texas, New Jersey and Massachusetts. He has also chaired numerous arbitration panels for the Financial Industry Regulatory Authority. In addition, Mr. Toptani is an officer, board member and general counsel for the UN Woman for Peace Association and the Bob Woodruff Foundation, and frequently advises 501(c)(3) organizations. Mr. Toptani graduated from the University of Michigan Law School with honors in 1987. He is a member of good standing with the Bar of the State of New York and is admitted to practice in the Southern District of New York, the Eastern District of New York, the Northern District of New York and the District of Connecticut.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 7th day of February 2022, at Charleston, South Carolina.

[SIGNATURE ON NEXT PAGE]



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